

## State Water Resources Control Board

January 26, 2016

(Via email and Certified Mail)

**CERTIFIED MAIL**

**NO. 7015 1520 0001 8019 5258**

Dr. Gillian Marks  
Division Manager  
Environmental Programs  
UCLA Office of Environment  
501 Westwood Plaza  
Los Angeles, California 90095  
[gmarks@ehs.ucla.edu](mailto:gmarks@ehs.ucla.edu)

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEMS  
LOCATED AT UNIVERSITY OF CALIFORNIA, LOS ANGELES, 405 SOUTH  
HILGARD AVENUE, LOS ANGELES**

Dear Dr. Marks:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on December 2, 2015, and January 14, 2016, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and title 23, California Code of Regulations (CCR), chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	<b>Failure to Maintain Operating Permit</b> – The facility permit to operate is expired.	All	December 2, 2015	December 2, 2015	H&SC 25284(a)
2	<b>Failure to Provide Valid State Board of Equalization (BOE) Registration Number</b> – BOE number has not been submitted to the CUPA or listed in CERS.	All	December 2, 2015	Ongoing	H&SC 25286(c)(9)
3	<b>Failure to Notify Local Agency of Designated Operator</b> – The designated operator certification form in CERS was incomplete because it did not include the expiration date of the operator's credentials.	All	December 2, 2015	Ongoing	23 CCR 2715(a)

No.	Violation	Tank	Start Date	Stop Date	Regulation
4	<b>Failure to Maintain Plot Plan –</b> The site plan in CERS fails to show sensor locations or other UST system components.	All	December 2, 2015	Ongoing	23 CCR 2711(a)(8)
5	<b>Failure to Maintain Tank Forms –</b> Tank information forms in CERS need to be updated to include: tank manufacturer, correct form of overfill protection, primary and secondary piping construction material, verification of the correct piping system type, verify fill components installed, list a form of corrosion protection, verify the installation date, and confirmation of a striker plate. Update UDC information on fleet service tanks.	All	December 2, 2015	Ongoing	H&SC 25286(a); 23 CCR 2711(a)
6	<b>Failure to Maintain Monitoring Plan –</b> Monitoring plans in CERS need to be updated to include: the tank monitoring secondary containment system, the monitoring panel model and sensor model numbers must be listed; pipe monitoring must be continuous and listed as dry for all tank piping, periodic system testing should say yes to secondary containment testing and yes to spill bucket testing; recordkeeping should say yes to alarm logs, visual inspection records and equipment maintenance and calibration records. Also, please confirm that tank 8 lists wet tank monitoring in CERS and confirm that tank 16 has a model 405 pipe sensor listed in CERS.	All	December 2, 2015	Ongoing	23 CCR 2711(a)(9)

No.	Violation	Tank	Start Date	Stop Date	Regulation
7	<b>Failure to Tag Monitoring Equipment</b> – The monitoring certification sticker was expired on monitoring panels for tanks 10 and 16; the sensor in the vent transition sump of the waste oil tank 3 and the annular sensor on tank 25. Also, please confirm the date on the ATG sensor of tank 25 because it was not legible at the time of inspection.	3, 10, 16, 25	December 2, 2015	Ongoing	23 CCR 2638(f)
8	<b>Failure to Maintain UST Monitoring System</b> – The green power light on the monitoring panel was not functioning at Fleet Services (1-3) and the Library (16).	1, 2, 3, 16	December 2, 2015	Ongoing	H&SC 25291(b); 23 CCR 2630(d)
9	<b>Failure to Continuously Monitor Emergency Generator Piping</b> – In lieu of a line leak detector, a daily generator inspection log is required for pressurized systems on emergency generators; daily logs were not available for review at the time of the inspection.	11, 12, 13, 16, 23, 24	December 2, 2015	Ongoing	23 CCR 2636(f)(6)
10	<b>Failure to Monitor Product Piping</b> – Sensors in the piping/fill sumps are unable to detect a leak at the earliest opportunity because the test boots are not pulled back from the double wall interstitial and/or the Schrader valves are incorrectly positioned upwards with the core in and cap on.	1, 2, 11, 12, 13, 19, 24, 26	December 2, 2015	Ongoing	23 CCR 2630(d)
11	<b>Failure to Monitor Product Piping</b> – Monitoring sensor in the fill/piping sump is not able to detect a leak at the earliest opportunity because it was raised above the lowest point in the sump, not placed beneath product piping, or not in a vertical position. At Medical Center (23, 24) the monitoring sensors were in alarm for only two of the three wet sumps.	1, 2, 3, 26, 11, 12, 13, 14, 17, 18, 19, 23, 24	December 2, 2015	Ongoing	23 CCR 2630(d)

No.	Violation	Tank	Start Date	Stop Date	Regulation
12	<b>Failure to Perform Annual Spill Containment Testing</b> – This facility did not perform annual spill containment tests on the three CO-Gen tanks because they have been in a state of repair since 2013. The last spill containment test was performed on November 19, 2012. The next certification was due on November 19, 2013.	11, 12, 13	November 20, 2013.	Ongoing	H&SC 25284.2
13	<b>Failure to Perform Annual Monitoring Certifications</b> – This facility did not perform annual monitoring certifications on the three CO-Gen tanks because they have been in a state of repair since 2013. The last monitoring certification was performed on November 19, 2012. The next certification was due on November 19, 2013.	11, 12, 13	November 20, 2013	Ongoing	23 CCR 2638
14	<b>Failure to Maintain Spill Containment Requirements</b> – The spill container had liquid and/or debris inside preventing its ability to hold five gallons.	3, 11, 19, 26	December 2, 2015	Ongoing	23 CCR 2635(b)(1)
15	<b>Failure to Perform Secondary Containment Testing</b> – This facility did not perform secondary containment testing on the tank at Wilshire Center. The last secondary containment test was performed on October 7, 2011, and it only reports a spill bucket test.	19	October 7, 2011	Ongoing	23 CCR 2637(a)
16	<b>Failure to Maintain Monitoring or Testing Records Onsite</b> – Secondary Containment testing results were not available at the time of inspection.	19	December 2, 2015	Ongoing	H&SC 25293; 23 CCR 2712(b)
17	<b>Failure to Monitor Product Piping</b> – No ability to visually monitor underground single wall piping in parking structure ceiling because piping is contained in a fireproof wrap with no sensors and there is no alarm log present.	19	January 14, 2016	Ongoing	H&SC 25281.5(b); 23 CCR 2630(d), 2638(a)



No.	Violation	Tank	Start Date	Stop Date	Regulation
18	<b>Failure to Perform Monthly Designated Operator Inspections</b> – The designated operator at Wilshire Center is not accurately reporting test compliance dates on the monthly designated operator inspection reports.	19	December 2, 2015	Ongoing	23 CCR 2715(c)

**You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and the Los Angeles City Fire Department within sixty (60) days from the date of this letter. Have your Designated Operator make specific notations in the next monthly designated operator report indicating the ongoing violations have been corrected. The monthly designated operator report and any associated photos must be submitted as proof of compliance.**

Please send all compliance documentation to the following:

**State Water Board**

Ms. Rebecca Green  
UST Enforcement Unit  
Office of Enforcement  
State Water Resources Control Board  
1001 I Street, 16<sup>th</sup> Floor  
Sacramento, California 95814  
[rebecca.green@waterboards.ca.gov](mailto:rebecca.green@waterboards.ca.gov)

**Local CUPA**

Mr. Reynaldo Husband  
Fire Inspector  
Los Angeles City Fire Department  
200 Main Street, Suite 1700  
Los Angeles, California 90012  
[reynaldo.husband@lacity.org](mailto:reynaldo.husband@lacity.org)

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at [amantha.henkel@waterboards.ca.gov](mailto:amantha.henkel@waterboards.ca.gov).

Sincerely,



Amantha Henkel  
Senior Environmental Scientist  
UST Enforcement Unit  
**Office of Enforcement**

cc: See next page.

cc: *(via email only)*

Captain Daniel Dragotto  
Los Angeles City Fire Department  
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